

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GENERAL ELECTRIC COMPANY,

Plaintiff,

v.

SIEMENS ENERGY, INC.,

Defendant.

Civil Action No.: 3:21-cv-25-JAG

**JOINT MOTION FOR ORDER ESTABLISHING BRIEFING SCHEDULE
AND REQUEST FOR HEARING**

General Electric Company (“GE” or “Plaintiff”) and Siemens Energy, Inc. (“Siemens Energy” or “Defendant”) (collectively, the “Parties”), by their respective undersigned counsel and pursuant to Local Civil Rule 7, file this joint motion seeking entry of the attached proposed Order establishing a briefing schedule in connection with GE’s Motion for Preliminary Injunction (the “Motion”) (Doc. No. 33).

The Parties have conferred by counsel, and propose that Siemens shall file its brief in opposition to the Motion on or before March 1, 2021, and GE shall file its rebuttal brief on or before March 15, 2021. The Parties also jointly request a hearing on this matter by the end of March 2021 (excluding March 29 and March 31 due to unavailability of counsel), subject to the Court’s availability. Finally, the Parties jointly request that any hearing on the Motion be conducted in person at the courthouse, but request telephone or Zoom access for any witnesses or party representatives who are unable to appear in person due to COVID-19.

WHEREFORE, the Parties respectfully request that the Court enter the attached proposed Order their Joint Motion for Order Establishing a Briefing Schedule.

Dated: February 10, 2021

Respectfully submitted,

GENERAL ELECTRIC COMPANY

By: /s/ Edward E. Bagnell, Jr
Dana D. McDaniel (VSB No. 25419)
Edward E. Bagnell, Jr (VSB No. 74647)
Spotts Fain P.C.
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000
Fax: (804) 697-2100
dmcdaniel@spottsfain.com
ebagnell@spottsfain.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

Brad S. Karp (*pro hac vice* forthcoming)
Brette Tannenbaum (*pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019-6064
(212) 373-3000
bkarp@paulweiss.com
btannenbaum@paulweiss.com

Karen L. Dunn (*pro hac vice*)
Michelle K. Parikh (*pro hac vice*)
2001 K Street, NW
Washington, DC 20006
(202) 223-7300
kdunn@paulweiss.com
mparikh@paulweiss.com
Counsel for General Electric Company

SIEMENS ENERGY, INC.

By: /s/ Brian C. Riopelle
Richard Cullen (VSB No. 16765)
Brian C. Riopelle (VSB No. 36454)
Rodney A. Satterwhite (VSB No. 32907)
Heidi E. Siegmund (VSB No. 89569)
MCGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
Phone: (804) 775-1009
Fax: (804) 698-2035
rcullen@mcguirewoods.com
briopelle@mcguirewoods.com
rsatterwhite@mcguirewoods.com
hsiegmund@mcguirewoods.com

KIRKLAND & ELLIS LLP

Gregg F. LoCascio (VSB No. 38908)
Edwin John U. (*pro hac vice*)
Sean M. McEldowney (*pro hac vice*)
Patrick Haney (*pro hac vice*)
Alexandra I. Russell (*pro hac vice*)
1301 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 389-5000
gregg.locascio@kirkland.com
edwin.u@kirkland.com
sean.mceldowney@kirkland.com
patrick.haney@kirkland.com
alexandra.russell@kirkland.com

Eugene F. Assaf (*pro hac vice*)
Eugene F. Assaf, P.C.
601 Lexington Avenue
New York, New York 10022
(212) 446-4800
eugene.assaf@kirkland.com
Counsel for Defendant Siemens Energy, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of February 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

By: /s/ Edward E. Bagnell, Jr
Edward E. Bagnell, Jr (VSB No. 74647)
Spotts Fain P.C.
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000
Fax: (804) 697-2100
ebagnell@spottsfain.com
Counsel for General Electric Company